

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Eduard Slinin,

Plaintiff,

1:15-cv-09674 (RJS)

- Against -

Alex Shnaider,

Defendant.

**DECLARATION OF KAREN C. DYER
IN SUPPORT OF DEFENDANT ALEX SHNAIDER'S
MOTION FOR SUMMARY JUDGMENT**

I, Karen C. Dyer, declare as follows:

1. I am a member of in good standing of the bar of the State of Florida, admitted to practice *pro hac vice* in the above-captioned litigation, and a partner at the law firm of Boies, Schiller & Flexner, counsel for Defendant Alexander Shnaider in this action. I submit this Declaration in support of Defendant's Motion for Summary Judgment. I have personal knowledge of the matters stated herein, and if called upon, I could testify hereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt of the deposition of Plaintiff, Eduard Slinin, taken on September 26, 2017.

3. Attached hereto as **Exhibit B** is a true and correct copy additional excerpts of the deposition of Plaintiff, Eduard Slinin, taken on September 26, 2017.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts of the deposition of Defendant, Alexander Shnaider, taken on September 15, 2017.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts of the deposition of Robert Lee, taken on September 14, 2017.

6. Attached hereto as **Exhibit E** is a true and correct copy excerpts of the deposition of Vadim Zilberman, taken on September 25, 2017.

7. Attached hereto as **Exhibit F** is a true and correct copy of Plaintiff Eduard Slinin's Reply to Defendant Alex Shnaider's First Set of Request for Admission.

8. Attached hereto as **Exhibit G** is a true and correct copy of Slinin deposition exhibit 11, Promissory Note and Guaranty Agreement dated December 29, 2008. of U.S. Patent Publication No. 2010/0170961, Bates stamped AS00006517 through AS00006529.

9. Attached hereto as **Exhibit H** is a true and correct copy of Slinin deposition exhibit 9, an email dated September 14, 2008, Bates stamped P009729 through P009730.

10. Attached hereto as **Exhibit I** is a true and correct copy of Slinin deposition exhibit 10, an email dated September 15, 2008, Bates stamped P009724 through P009725.

11. Attached hereto as **Exhibit J** is a true and correct copy of Lee deposition exhibit 30, a chain of emails dated August 6, 2008, Bates stamped AS005297.

12. Attached hereto as **Exhibit K** is a true and correct copy of Lee deposition exhibit 25, a chain of emails dated May 27, 2009, Bates stamped AS00007022 through AS00007023.

13. Attached hereto as **Exhibit L** is a true and correct copy of Zilberman deposition exhibit 7, an email dated October 21, 2011, Bates stamped P000328 through P000329.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 16th day of November, 2017, in New York, New York.

/s/ Karen C. Dyer
Karen C. Dyer